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Attorneys for Defendant  
WALMART INC.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

KORTNEY OLSON,  
Plaintiff,  
v.  
WALMART STORES INC. AND  
WONDER NATION,  
Defendants.

Case No. 2:20-cv-00152-GMN-NJK  
**UNOPPOSED MOTION TO  
EXTEND TIME TO RESPOND TO  
INITIAL COMPLAINT**

**(Fourth Request)**

Complaint served: February 7, 2020  
Current response date: May 29, 2020  
New response date: June 28, 2020

Judge: Gloria M. Navarro  
Magistrate Judge: Nancy J. Koppe

1 According to Local Rule IA 6-1 of the United States District Court for the  
2 District of Nevada, Walmart Inc., owner of the subsidiary that owns the trademark  
3 Wonder Nation ( “Defendant”), with Plaintiff’s consent, respectively requests that  
4 the Court extend Defendant’s time to respond to Plaintiff’s Complaint. This is  
5 Defendant’s fourth and anticipated final request in view of the Parties’ draft  
6 settlement agreement.

7 **MEMORANDUM OF POINTS AND AUTHORITIES**

8 On January 22, 2020, Plaintiff filed a Complaint with the United States  
9 District Court for the District of Nevada. On February 7, 2020, Plaintiff caused  
10 copies of the Summons and Complaint to be delivered and served on Defendant.

11 Plaintiff, who originally filed her complaint pro se, retained counsel and  
12 granted Defendant multiple 30-day extensions of time, which the Court granted,  
13 pursuant to which Defendant had until May 29, 2020 to answer, move to dismiss or  
14 strike, or otherwise respond to Plaintiff’s Complaint.

15 Plaintiff and Defendant have been in settlement discussions, which are  
16 currently ongoing. The Parties have a draft settlement agreement.

17 In an effort to resolve this matter and continue their discussions, Plaintiff and  
18 Defendant have agreed to extend Defendant’s response deadline by an additional  
19 30-days from Defendant’s current response date, pursuant to which Defendant shall  
20 have until June 28, 2020 to answer, move to dismiss or strike, or otherwise respond  
21 to Plaintiff’s Complaint. The Parties expect to finalize their draft settlement  
22 agreement over the next few weeks. Plaintiff’s counsel is not yet admitted in  
23 Nevada, nor has he retained the services of local counsel in this jurisdiction.

24 The Parties’ settlement negotiations and interests in resolving this dispute  
25 serve as just cause for the filing of this request. Defendant reserves the right to file  
26 an answer, motion or dismiss or strike, or other responsive pleading prior to its June  
27 28, 2020 deadline.

28 //

1 Therefore, Defendant respectfully moves this Court for an extension until  
2 and including **June 28, 2020** to answer, move to dismiss or strike, or otherwise  
3 respond to the Complaint filed in this matter.

4 Dated: May 28, 2020

**ROPERS MAJESKI KOHN &  
BENTLEY PC AND ARENT FOX LLP**

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7  
8 By: /s/ Allan E. Anderson

9 STEPHEN J. ERIGERO (SBN 11562)  
10 TIMOTHY J. LEPORE (SBN 13908)

11 ALLAN E. ANDERSON

12 Attorneys for Defendant  
13 WALMART INC.  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

KORTNEY OLSON,  
Plaintiff,  
v.  
WALMART STORES INC. AND  
WONDER NATION,  
Defendants.

Case No. 2:20-cv-00152-GMN-NJK

**~~PROPOSED~~ ORDER TO EXTEND  
TIME TO RESPOND TO INITIAL  
COMPLAINT**

Complaint served: February 7, 2020  
Current response date: May 29, 2020  
New response date: June 28, 2020

Judge: Gloria M. Navarro  
Magistrate Judge: Nancy J. Koppe

1 The Court, having reviewed Walmart Inc. (“Defendant”)’s Unopposed  
2 Motion to Extend Time to Respond to Plaintiff Kortney Olson’s Initial Complaint,  
3 and finding that just cause exists to extend Defendant’s deadline to answer or  
4 otherwise respond to the Complaint, hereby orders as follows:

5 Defendant shall have to, and including, June 28, 2020 to answer or otherwise  
6 respond to the Complaint.

7  
8 **IT IS SO ORDERED.**

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10   
11 Honorable Nancy J. Koppe  
12 United States Magistrate Judge

13 Dated: May 29, 2020  
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